

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )

**MARITIME COMMUNICATIONS/LAND )  
MOBILE, LLC )**

EB Docket No. 11-71  
File No. EB-09-IH-1751  
FRN: 0013587779

Participant in Auction No. 61 and Licensee of )  
Various Authorizations in the Wireless Radio )  
Services )

Application File Nos. 0004030479,  
0004144435, 0004193028,  
0004193328, 0004354053,  
0004309872, 0004310060,  
0004314903, 0004315013,  
0004430505, 0004417199,  
0004419431, 0004422320,  
0004422329, 0004507921,  
0004153701, 0004526264,  
0004636537, and 0004604962

Applicant with **ENCANA OIL AND GAS (USA), )  
INC.; DUQUESNE LIGHT COMPANY; DCP )  
MIDSTREAM, LP; JACKSON COUNTY )  
RURAL MEMBERSHIP ELECTRIC )  
COOPERATIVE; PUGET SOUND ENERGY, )  
INC.; ENBRIDGE ENERGY COMPANY, INC.; )  
INTERSTATE POWER AND LIGHT )  
COMPANY; WISCONSIN POWER AND )  
LIGHT COMPANY; DIXIE ELECTRIC )  
MEMBERSHIP CORPORATION, INC.; )  
ATLAS PIPELINE – MID CONTINENT, LLC )  
DENTON COUNTY ELECTRIC )  
COOPERATIVE, INC., DBA COSERV )  
ELECTRIC; AND SOUTHERN CALIFORNIA )  
REGIONAL RAIL AUTHORITY )**

For Commission Consent to the Assignment of )  
Various Authorizations in the Wireless Radio )  
Services )

**FILED/ACCEPTED**

**AUG 22 2011**

Federal Communications Commission  
Office of the Secretary

To: Marlene H. Dortch, Secretary  
Attention: Chief Administrative Law Judge Richard L. Sippel

**SKYTEL'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Warren C. Havens, Environmental, LLC, Intelligent Transportation and Monitoring  
Wireless, LLC, Skybridge Spectrum Foundation, Telesaurus Holdings GB, LLC, Verde Systems,  
LLC, and V2G LLC (collectively, "SkyTel"), pursuant to Section 1.325 of the Commission's

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rules, 47 C.F.R. § 1.325, by their attorneys, hereby request that Maritime Communications/Land Mobile, LLC (“Maritime”) produce the following documents to the undersigned attorneys at the office of SkyTel’s counsel, Drinker Biddle & Reath LLP, 1500 K Street, N.W., Suite 1100, Washington, D.C. 20005, for inspection and copying within ten (10) calendar days of the date of this request.

### **Definitions**

The following words and terms, as used in this document request, have the meanings set forth below:

1. The term “Maritime” refers to Maritime Communications/Land Mobile, LLC, a Delaware LLC, and any divisions, departments, affiliates, subsidiaries, parent entities, predecessors- and successors- in-interest thereof, including, without limitation, its directors, officers, managers, other parties in control, agents, employees, and representatives and any other persons acting or purporting to act on its behalf. For purposes of this definition, affiliate shall include, but not be limited to, Sandra DePriest, Donald R. DePriest, and John Reardon.

2. The term “Commission” shall mean the Federal Communications Commission, including any Bureau or Office thereof. For the avoidance of doubt, the term “Commission” shall include the Enforcement Bureau as well as the Wireless Telecommunications Bureau.

3. The term “document” means, without limitation, all written or documentary material of any kind, full and complete, in printed hard copy or electronic form, including the original and all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise, including, by not limited to, applications, correspondence, electronic mail, memoranda, notes, diaries, statistics, letters, telegrams, minutes, agendas, expense accounts, bills of lading, contracts, reports, studies, statements, receipts,

returns, summaries, pamphlets, books, inter-office and intra-office communications, notations of any sort or of conversations (including telephone conversations or meetings), bulletins, invoices, work sheets, computer files, or any other documentary materials of any nature whatsoever, and all drafts, alterations, modifications, changes and amendments of any of the foregoing, in the possession, custody, or control of Maritime.

4. The term “identify,” when used in connection with a document, means that Maritime should state the document’s full title, its author(s), including any contributors to the contents, the date of the document, and any and all recipients and copies.

5. “Persons” includes natural persons, corporations, partnerships including limited partnerships, associations, limited liability companies, and other legal entities, and governments or governmental bodies, commissions, boards, agencies or entities.

6. “Applications” shall mean the short-form application, on FCC Form 175, Maritime submitted to participate in Auction 61, FCC File No. 0002191807, including any formal or informal, major or minor amendments thereto; the long-form application, on FCC Form 601, Maritime submitted following Auction 61, FCC File No. 0002303355, including any formal or informal, major or minor amendments thereto; and the Form 602 that Maritime filed or confirmed for purposes of said short form and long form applications, including any formal or informal major or minor amendments thereto.

7. “Site Applications” shall mean all applications, including major and minor amendments, filed by Maritime with the Commission to obtain, maintain, modify, renew, or obtain any relief with regards to its site-based “AMTS” (Automated Maritime Telecommunications System) licenses including the component stations’ authority under each such license.

8. "Licenses" shall mean any and all FCC authorizations of Maritime including, but not limited to, any and all authorizations which are listed in Attachment A to the Hearing Designation Order released on April 19, 2011 in this proceeding.

### **Instructions**

The following instructions shall apply to this document request:

1. References to the singular also include the plural and vice versa.
2. If any document exists or existed, but is currently unavailable, identify such document and its contents as completely as possible, explain why it is unavailable, and provide the date the document was created, its author, its recipient, and the other information under the above definition of "identify."
3. If an otherwise responsive document is withheld due to a claim of privilege, or on another basis, state fully the nature of the privilege or other basis and explain why the otherwise responsive document is encompassed by the privilege or other basis. Also, identify the document, provide a brief description of the contents of the document, as well as the date the document was created, its author and its recipient and the other information under the above definition of "identify."
4. For each document produced, indicate the number, or numbers, of the document request to which it is responsive.
5. This request is continuing in character.
6. Unless otherwise stated, the time frame for all document requests is from January 1, 2002 to the present.

### **Document Requests**

1. Provide an unredacted copy of the Hearing Designation Order released on April 19, 2011 in the above-captioned proceeding.
2. Identify and provide all documents (including but not limited to licensing filings and correspondence) Maritime sent or transmitted to the Commission referencing or regarding the Applications, and/or the Site Applications, and/or the Licenses. This includes, without limitation, all correspondence and/or other documents Maritime sent or transmitted to the Commission in response to the February 26, 2010 letter of inquiry from Gary Schonman, Special Counsel, Investigations and Hearings Division, Enforcement Bureau, addressed to Sandra M. DePriest of Maritime. With respect to the documents referencing or regarding the Site Applications, the time frame is from the initial submission of any Site Application to the present.
3. Identify and provide all documents the Commission sent or transmitted to Maritime referencing or regarding the Applications and/or Licenses. This includes, without limitation, all correspondence the Commission sent or transmitted to Maritime referencing or regarding the Applications and/or Licenses and all correspondence or documentation the Commission sent or transmitted to Maritime referencing or regarding the February 26, 2010 letter of inquiry from Gary Schonman, Special Counsel, Investigations and Hearings Division, Enforcement Bureau, to Dennis C. Brown, Esq., counsel for Maritime, or responding to correspondence or documentation Maritime submitted to the Commission in response to that letter of inquiry.
4. Identify and provide all documents indicating when and to what extent facilities associated with Maritime's site-based Licenses have been constructed.

Respectfully Submitted,

Warren C. Havens, Environmental, LLC,  
Intelligent Transportation and Monitoring  
Wireless, LLC, Skybridge Spectrum  
Foundation, Telesaurus Holdings GB, LLC,  
Verde Systems, LLC, and V2G LLC

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Their Attorneys

August 22, 2011



**CERTIFICATE OF SERVICE**

I, Patrick R. McFadden, herby certify that on this 22<sup>nd</sup> day of August, 2011, a true copy of this Opposition was served via first class, postage paid United States Mail upon the following:

The Honorable Richard L. Sippel  
Chief Administrative Law Judge  
Federal Communications Commission  
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